

EXHIBIT 66

CONFIDENTIAL



Transcript of **Gene Steinberg**

Monday, May 9, 2022

*National Coalition on Black Civic Participation, et al.
v. Jacob Wohl, et al.*

www.trustpoint.one
www.alderonreporting.com
800.FOR.DEPO (800.367.3376)
Scheduling@Trustpoint.One

Reference Number: 115545

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----
4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and
ANDREA SFERES,

7 Plaintiffs, Civil Action No.
8 1:20-cv-08668-VM-OTW
9 -and-

10 People of the STATE OF NEW YORK, by its Attorney
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK

12 -vs-

13 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
14 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
ROBERT MAHANIAN and JOHN and JANE DOES 1-10

15 Defendants.
16 -----

17
18 Deposition of GENE STEINBERG, Plaintiff,
19 herein, taken by Defendant, pursuant to Notice via
20 Zoom, on Monday, May 9, 2022, at 10:00 a.m., before
21 Deirdre Smith, a stenographer and notary public
22 within and for the State of New York.
23
24
25

1 A P P E A R A N C E S

2

3 ORRICK HERRINGTON & SUTCLIFFE, LLP

4 51 West 52nd Street

5 New York, NY 10019-6142

6 Appearing on behalf of the Plaintiff

7 Phone: (617) 880-1800

8 Email: brittany.roehrs@orrick.com

9 franklin.monsour@orrick.com

10 BY: BRITTANY ROEHRS, ESQ.

11 FRANKLIN MONSOUR, ESQ.

12

13

14

15 GERSTMAN SCHWARTZ LLP

16 Appearing on behalf of the Defendant

17 60 E. 42nd Street, Suite 4700 Office 21

18 New York, NY 10165

19 Phone: (212) 227-7070

20 Email: rkleinman@gerstmanschwartz.com

21 BY: RANDY KLEINMAN, ESQ.

22

23

24

25

1 A P P E A R A N C E S (continued)

2

3 LAWYERS COMMITTEE FOR CIVIL RIGHTS UNDER LAW

4 Appearing on behalf of Plaintiff

5 1500 K Street NW

6 Suite 900

7 Washington, DC 20005

8 BY: MARC EPSTEIN, ESQ.

9

10

11

12 STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL

13 Appearing on behalf of Plaintiff

14 28 Liberty Street

15 Floor 18, New York, NY 10005-1495

16 Phone: (212) 416-6046

17 BY: COLLEEN FERITY, ESQ.

18

19

20

21

22

23

24

25

1 MS. ROEHRS: Objection.

2 A. Can you explain? I'm not sure I
3 understand the question.

4 Q. Sure. Well, let's do it like this, prior
5 to your involvement in this lawsuit did you have a
6 conversation with any of the other plaintiffs in
7 this lawsuit?

8 A. My then partner, Mary Winter, yes.

9 Q. What exactly did you discuss with Ms.
10 Winter?

11 MS. ROEHRS: Objection.

12 A. So, after I received the robocall the
13 number one thing we discussed was whether to vote in
14 the presidential election in-person verses vote by
15 mail. Because we had voted by mail in the primary
16 and our plan was to vote by mail because of Covid,
17 by mail as well. So that was a discussion that we
18 discussed.

19 Q. Did you have any other conversations?

20 A. We lived together. I'm sure we did.

21 Q. Yeah, that was a bad question.
22 Specifically, with regard to the August 26, 2020
23 robocall did you have any other discussions about
24 that call?

25 MS. ROEHRS: Objection.

1 as a result of the trauma you experienced stemming
2 from your criminal conviction?

3 MS. ROEHRS: Objection.

4 A. I would say I've seen therapist as a
5 result.

6 Q. How long have you been seeing this
7 therapist for?

8 A. This specific one, six years.

9 Q. And how long have you been seeing a
10 therapist?

11 MS. ROEHRS: Objection.

12 A. I don't know the answer to that.

13 Q. More than ten years?

14 A. Don't know the answer to that.

15 Q. Approximately, more than ten years?

16 A. I don't recall. I would be guessing.

17 Q. Have you ever been diagnosed with any
18 mental health condition or disorder?

19 MS. ROEHRS: Objection.

20 A. No.

21 Q. Is it fair to say that you were seeing a
22 therapist long before you received the August 26,
23 2020 robocall?

24 A. That's fair.

25 Q. What inspired you to create Freidom?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T I O N

THIS IS TO CERTIFY, THAT I, DEIRDRE M. SMITH,
on Monday, May 9th of 2022, reported the proceedings
contained in the foregoing 71 pages at the time and
place as set forth in the heading in the foregoing
matter. That the transcript is a true and accurate
transcription of my stenographic notes, using
Computer Aided Transcription, to the best of my
ability.

IN WITNESS WHEREOF, I have hereunto set my had
this 23rd day of May, 2022.



Deirdre M. Smith